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Alice Evitt Bandy President

Phil Erli General Manager

January 21, 2013

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 12th Street, SW, Suite TW-A325 Washington, DC 20554

EB Docket No. 06-36

Re: Certification of CPNI Compliance Filing- January 21, 2013

Ringgold Telephone Company Ringgold Telephone Long Distance RTC Solutions, Inc.

P.A. gladin

499 Filer 1D # 806097

499 Filer ID # 823628

499 Filer ID # 827605

Dear Ms. Dortch:

The telecommunications carriers listed above are filing the attached CPNI Certification together with the statement of procedures for operational compliance with the FCC's CPNI rules.

Sincerely,

Michael A. Wallin Regulatory Manager

Attachment

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ATTACHMENT

CERTIFICATE OF COMPLIANCE

Company Names: Ringgold Telephone Company, Ringgold Telephone Long Distance and RTC Solutions, Inc.

Address: 6203 Alabama Hwy

P.O. Box 869

Ringgold, GA 30736

As a corporate officer of these companies, I hereby certify that, based on my personal knowledge, the Companies have established operating procedures that are adequate to ensure compliance with the rules established by the Federal Communications Commission ("FCC") concerning Customer Proprietary Network Information" ("CPNI"), as set forth in Part 64, Subpart U, of the FCC's Rules and Regulations, 47 C.F.R. § 64.2001 *et seq.*, as revised.

The attached Statement demonstrates such compliance.

Signalure:
Title: Executive Vice President
Date: <u>1/21/2013</u>



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Alice Evitt Bandy President

Executive Vice President

Phil Frli

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RINGGOLD TELEPHONE COMPANY

Ringgold Telephone Company, Inc. 499 Filer ID 806097 Ringgold Telephone Long Distance, Inc. 499 Filer ID 823628 RTC Solutions, Inc. 499 Filer ID Pending

P. O. Box 869 Ringgold, GA 30736 706-965-2345

2012 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE January 21, 2013

This statement accompanies the Company's 2012 Customer Proprietary Network Information ("CPNI") Certification, as required by Section 64.2009(e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC's rules. See 47 C.F.R. § 64.2001 et seq.

All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.

1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI **not** requiring customer authorization under Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

5. Customer Notification and Authorization Process

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval

requirements under Section 64.2008. The Company has complied with the notice requirements for Opt-Out. The Company does not provide CPNI to other parties and thus has not used the optin approval process.

6. Record of Customer CPNI Approval/Non-Approval

The Company has developed and utilizes a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

7. Procedures Protecting Against Disclosure of CPNI

The Company has implemented procedures for compliance with Section 64.2010 including, but not limited to the following:*

authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits;

implementation of procedures to provide immediate notification to customers of account changes, including changes in address-of-record and attempts at access to CPNI through use of back-up methods due to forgotten passwords.

*The Company does not provide customers with on-line access to customer account information.

8. Actions Taken Against Data Brokers and Responses to Customer Complaints

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI.

Not applicable. No actions taken against data-brokers.

No customer complaints received.

9. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

10. Supervisory Review Process for Outbound Marketing

The Company has established a supervisory review process regarding its compliance with the rules for outbound marketing situations as required in Section 64.2009 (c) and (d). Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.

11. Procedures for Notifying Law Enforcement of CPNI Security Breaches

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.